

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN RE SEARCH WARRANT : 22MJ486
:

MOTION TO SEAL

NOW COMES the United States of America, by Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, through her assistant, Lindsey A. Freeman, and respectfully moves this Honorable Court to seal the search warrant, affidavit thereto, and the supplement to this motion in this matter. The caption for the search warrant in 1:22MJ486, which includes information related to a target, has been altered in this document to protect the ongoing investigation. Such sealing is within the inherent power of the Court to control papers filed with it. *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989).

In support whereof, the government shows unto the Court the following:

(1) The search warrant detailed above stemmed from an ongoing criminal investigation in another state into possession and distribution of child pornography on an internet platform. That investigation continues to operate and identify other leads and targets involved in unlawful conduct.

(2) Premature disclosure of the contents of the search warrant and related materials may warn potential targets of this investigation, leading to

potential destruction of evidence and/or witness tampering.

(3) There is also reason to believe that publication of the warrant documents could seriously hinder further investigation or delay a trial, including by giving targets an opportunity to flee from prosecution.

WHEREFORE, the government respectfully moves that this Honorable Court seal the search warrant, affidavit thereto, and the supplement to this motion, and modify the case caption as reflected above and in the motion to seal until further order of the Court.

This the 12th day of December, 2022.

Respectfully submitted,

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